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November 7, 2023

Re: *United States v. Jack Cabasso, et al.*
(Aventura Technologies)
Dkt.: 19 Cr 582

Hon. Joan M. Azrack
United States District Judge

Dear Judge Azrack:

I am counsel for corporate defendant Aventura Technologies in the above referred to matter. This matter is scheduled for an in-person status and scheduling conference today, November 7, 2023 at 1:30pm.

I respectfully request that the Court allow me to appear by telephone or video link at today's conference as I expect the conference will last approximately 5 minutes, my office is in Manhattan and the round-trip will be more than three hours of driving, my client is an entity and not an actual person, the decision for the corporation to resolve the charges against it are wholly dependent on whether the individual defendants resolve their charges (and I have not been informed by co-counsel that such pleas have been resolved), and the corporation has not yet received a written plea offer so final resolution cannot yet be done for it in any case.

I spoke with AUSA Alexander Mindlin, counsel for the Government, and he had no objection to my request so long as the status conference remained in-person for the two individual defendants.

I therefore respectfully request that I be allowed to appear at today's conference remotely (on any terms required by the Court.) I thank the Court for its consideration of my request.

Very truly yours,

Sam Braverman

Samuel M. Braverman
National Co-Chair
White-Collar Defense Group